

2. The statements contained in this Declaration are based upon my personal knowledge, review and consideration of documents available to me in my official capacity, and on information obtained from other FBI employees.

3. DU II provides litigation support to other units within OGC, as well as numerous other entities. DU II is responsible for locating, reviewing, and processing for release any and all responsive materials which pertain to litigation and administrative matters in which the Bureau is either directly or indirectly involved. As Unit Chief of DU II, I am responsible for overseeing the Paralegal Specialists who locate, review, process, and produce documents related to a variety of document production requests.

4. I have access to the records contained in the FBI's CRS. I am also personally familiar with the FBI records maintenance and retrieval system.

5. All records contained in the CRS are identifiable through the FBI's practice of indexing records to a particular subject matter or individual. Once indexed, a record pertaining to a particular subject matter or individual is retrievable through a search of the general indices to the CRS. In short, the CRS is the FBI's official system of records for all investigative, administrative, and official business of the agency.

6. The CRS enables the FBI to maintain information it has acquired while fulfilling its mandated law enforcement responsibilities. The records maintained here consist of administrative, applicant, criminal, personnel, and other files compiled for law enforcement purposes. Searching the CRS is the means by which the FBI can determine what retrievable information if any, the agency may have in its files on a particular subject matter or individual.

7. As Unit Chief, I oversee the Paralegal Specialists who made a diligent search of the general indices to the CRS as of December 16, 2024. A search of the CRS did not locate any

claim submitted to the FBI on behalf of plaintiff Sallamondra Robinson; however, the search located a letter to the FBI entitled “October 25, 2024 Notice of Intent to Sue Federal Bureau of Investigation.” A true and correct copy of that letter, together with the envelope in which it was received, date-stamped November 4, 2024, is attached hereto as Exhibit A.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 17th day of December, 2024.

William L. Harris

William L. Harris
Unit Chief
Discovery Unit II
Office of the General Counsel
Federal Bureau of Investigation

EXHIBIT A



October 25, 2024
Notice of Intent to Sue
Federal Bureau of Investigation

****THIS CORRESPONDENCE IS SENT PURSUANT TO 28 U.S.C. §§ 2671 *et. seq.*, 2401, 2675(a)**

Via Certified Mail Return Receipt: 9589 0710 5270 1567 6241 18

Federal Bureau of Investigation
935 Pennsylvania Ave NW
Washington, D.C. 20535-0001

RE: Negligence Claim on Behalf of Sallamondra Robinson
Date of Loss: November 2022 - April 2023

To Whom It May Concern,

COMES NOW, the Claimant, Sallamondra Robinson, by and through her undersigned counsel and pursuant to the FTCA, 28 U.S.C. §§ 2671 *et. seq.*, 2401, 2675(a), provides written notice that Sallamondra Robinson seeks to file a tort claims lawsuit for money damages against the Federal Bureau of Investigation and its agents for negligence. The FBI failed to promptly and thoroughly investigate the wrongful death of Shanquella Robinson. Additionally, the FBI failed to return Shanquella Robinson's personal property after it was no longer needed for evidentiary purposes. As a result of the FBI's breach of duty, Sallamondra Robinson suffered economic and emotional injuries. In light of the severe injuries suffered, Sallamondra Robinson will seek economic damages including but not limited to compensatory and consequential damages in excess of \$25,000.00.

Claimant provides the following information:

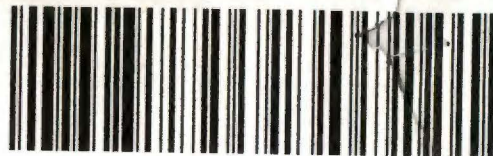
Claimant/Our Client: Sallamondra Robinson, personally, and as the
personal representative of the Estate of Shanquella Robinson.

Claimant's Date of Birth: October 21, 1961

Respectfully,
Sue-Ann Robinson, Esq.
614 S. Federal Highway
Fort Lauderdale, FL 33301



c/o Sue-Ann Robinson, Esq.
Marker Building
614 S. Federal Highway
Fort Lauderdale, FL 33301



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FL 33311
OCT 25, 2024

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Federal Bureau of Investigation
935 Pennsylvania Ave NW
Washington, D.C. 20535-0001



Rm 10140